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October 8, 2020

VIA ECF

Honorable Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Mangano
16-CR-540 (S-2) (JMA)

Dear Judge Azrack:

As you are aware, I am attorney for Edward Mangano. We are in receipt of the Court's Order of October 6, 2020, in which Your Honor has directed a hearing on Defendant's Motion for New Trial and, additionally, ordered that, "Singh is directed to testify at the hearing concerning his post-trial deposition testimony and will be subject to questioning by the government, the defense and, if necessary, by the Court."

I write to respectfully request that the defense be given the first opportunity to question Singh at the hearing concerning his post-trial deposition testimony. This hearing, of course, has been ordered as a result of the Defendant's motion, in which we requested the scheduling of this hearing so that Singh could provide testimony on this issue.

Moreover, as requested in our Reply Brief of June 5, 2020, we ask that the Government be directed to have no direct or indirect contact with Singh concerning the subject matter of the hearing in the lead-up to the scheduled hearing.

Thank you for your consideration.

Very truly yours,


KEVIN J. KEATING

KJK:dg
cc: AUSA Christopher Caffarone
AUSA Lara Gatz
AUSO Catherine Mirabile